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10 *Westcor Land Title Insurance Company*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 DEUTSCHE BANK NATIONAL TRUST  
10 COMPANY, AS TRUSTEE FOR THE  
11 HOLDERS OF GSAMP TRUST 2005-AHL  
12 MORTGAGE PASS-THROUGH  
13 CERTIFICATES, SERIES 2005-AHL,

14 *Plaintiff,*

15 V.

16 WESTCOR LAND TITLE INSURANCE  
17 COMPANY,

18 *Defendant,*

Civil Action No. 2:19-cv-00303-GMN-EJY

**STIPULATION AND ORDER  
FOR EXTENSION OF TIME  
FOR DEFENDANT WESTCOR  
LAND TITLE INSURANCE  
COMPANY TO RESPOND TO  
PLAINTIFF'S OPPOSITON TO  
DEFENDANT'S MOTION FOR  
LEAVE TO FILE SUPPLEMENTAL  
AUTHORITIES AND  
COUNTERMOTION TO STAY  
LITIGATION [ECF NO. 42]**

**(Second Request)**

18 Plaintiff, Deutsche Bank National Trust Company, As Trustee For The Holders of  
19 GSAMP Trust 2005-AHL Mortgage Pass-Through Certificates, Series 2005-AHL (hereinafter  
20 "Deutsche Bank"), and Defendant Westcor Land Title Insurance Company, ("Westcor"),  
21 (collectively, the "Parties"), by and through their respective attorneys of records, hereby agree  
22 and stipulate as follows:  
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1. On November 12, 2019, Westcor filed a Notice of Motion and Motion to File Supplemental Authority [ECF No. 28] in support of Motion to Dismiss [ECF No. 7] (“Motion”);

2. Deutsche Bank filed its Opposition [ECF No. 41] to Westcor's Motion and Counter-motion to Stay Litigation [ECF No. 42] December 18, 2019;

3. Westcor's Reply and Response to the Countermotion was due on December 25, 2019 (hereinafter "Responses");

4. On December 24, 2019, a First Stipulation and Order extending the time for Westcor's Responses [ECF No. 43] was filed due to the upcoming holidays.

5. On December 26, 2020 the Court granted this request, allowing Westcor up to January 10, 2020, to file its Responses [ECF No. 44];

6. Westcor is currently considering whether a stipulation to stay litigation pending the appeal to the Ninth Circuit in a related matter is warranted in this case, which would no longer necessitate a response to the pending motions. However, counsel for Westcor needs additional time to discuss the proposed stipulation with its client representative.

7. As such, the Parties request an extension until January 17, 2020 for Westcor to file its Responses.

8. This extension is requested to allow Westcor to consider the proposed stipulation to stay litigation and if a stipulation cannot be reached, to review and respond to the points and authorities cited to in Deutsche Bank's Opposition and Countermotion.

9. Counsel for Deutsche Bank does not oppose this extension;

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1           10. This is the second request for an extension, is made in good faith, and not for  
2 purposes of delay.

3                   **IT IS SO STIPULATED.**

4 DATED this 10<sup>th</sup> day of January, 2020.

5 WRIGHT, FINLAY & ZAK, LLP

6 */s/ Lindsay D. Robbins*

7 LINDSAY D. ROBBINS, ESQ.

8 Nevada Bar No. 13474

9 7785 W. Sahara Avenue, Suite 200

Las Vegas, NV 89117

Attorneys for Plaintiff,

10 Deutsche Bank National Trust Company, As

11 Trustee For The Holders Of GSAMP Trust

2005-Ahl Mortgage pass-Through Certificates,

12 Series 2005-Ahl

DATED this 10<sup>th</sup> day of January, 2020.

RESNICK & LOUIS, P.C.

*/s/ Sue Trazig Cavaco*

13 SUE TRAZIG CAVACO, ESQ.

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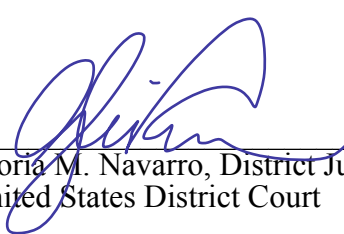
Attorneys for Defendant,

Westcor Land Title Insurance Company

14                   **ORDER**

15           **IT IS HEREBY ORDERED** that Defendant, WESTCOR LAND TITLE  
16 INSURANCE COMPANY, is granted an extension, up to and including January 17, 2020 to  
17 address Deutsche Bank's Opposition [ECF No. 41] and to respond to the Countermotion [ECF  
18 No. 42].

19 Dated this 10 day of January, 2020.

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22 Gloria M. Navarro, District Judge  
United States District Court